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December 29, 2023

**Via ECF**

Hon. Jesse M. Furman  
U.S. District Court, Southern District of New York  
40 Centre Street  
New York, New York 10007

Application GRANTED. The initial pretrial conference is hereby ADJOURNED *sine die*. The Clerk of Court is directed to terminate ECF No. 13.

SO ORDERED.

Re: *Robert Mecea v. IBT Media Inc.*  
Docket No: 1:23-cv-08880-JMF

A handwritten signature in black ink, appearing to read "Jesse M. Furman".

January 2, 2024

Dear Judge Furman:

This firm represents Plaintiff Robert Mecea ("*Plaintiff*") in the above-referenced matter. Pursuant to Section 2(E) of Your Honor's Individual Rules & Practices, Plaintiff respectfully requests a continuance, *sine die*, of the virtual initial pretrial conference currently scheduled for January 11, 2024 at 9:00 a.m. and related deadlines.

Plaintiff makes this request as the Defendant IBT Media Inc. ("*Defendant*") has failed to appear or answer the complaint, and is therefore in default. The Clerk's Certificate of Default was entered on December 13, 2023 (Doc. No. 12). Thereafter, Plaintiff attempted to contact Defendant via email regarding the entry of default and possible resolution of this matter, however Plaintiff has not yet received a response. If Defendant fails to respond and does not appear in the action, Plaintiff intends to proceed with his motion for default judgment within thirty (30) days. Pursuant to the Individual Rules & Practices Section 2(E):

- (1) the original date of the Initial Conference is January 11, 2024;
- (2) no previous requests for adjournment or extension have been made;
- (3) No other dates will be impacted by this request as Defendant is currently in default of answering or appearing. Further, as Defendant is in default, Plaintiff is unable to advise whether Defendant consents to this request.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ Renee J. Aragona  
Renee J. Aragona